

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WILLIAM E. DUGAN, <i>et al.</i>)	
)	
Plaintiffs,)	CIVIL ACTION
)	
v.)	NO. 07 C 1298
)	
SUNSET ROLL-OFF SERVICES, LLC.,)	JUDGE ROBERT W. GETTLEMAN
an Illinois limited liability company,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, SUNSET ROLL-OFF SERVICES, LLC., an Illinois limited liability company, in the total amount of \$48,732.58, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$811.25.

On April 4, 2007, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to the Illinois Secretary of State because the limited liability company's registered agent could not, with reasonably diligence, be found at the registered office of record in Illinois) (a copy of the Summons and Affidavit of Compliance for Service on Secretary of State form is attached hereto). Therefore, Defendant's answer was due on April 24, 2007. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 3rd day of May 2007:

Ms. Carol Pruim, Registered Agent
Sunset Roll-Off Services, LLC
13432 West View Drive
Palos Heights, IL 60463

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon
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